

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Criminal No. 21-cr-20184

Plaintiff,

Honorable Matthew F. Leitman

v.

Violations:

21 U.S.C. §§ 841(a)(1)

D-1 Michael Fraley, Jr.,  
a/k/a "Sarge,"

D-2 Alexandria N. Dodge,

Defendants.

F I L E D  
JUN 16 2021  
U.S. DISTRICT COURT  
FLINT, MICHIGAN

**FIRST SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

(21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(viii) - Distribution of Methamphetamine)

D-1 Michael Fraley, Jr.

1. On or about December 1, 2020, in the Eastern District of Michigan, defendant, Michael Fraley, Jr., a/k/a Sarge, knowingly and intentionally distributed 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

**COUNT TWO**

(21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(viii) - Distribution of Methamphetamine)

D-2 Alexandria N. Dodge

2. On or about December 3, 2020, in the Eastern District of Michigan, defendant, Alexandria N. Dodge, knowingly and intentionally distributed 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii).

**COUNT THREE**

(21 U.S.C. §§ 841(a)(1) & (b)(1)(C) - Distribution of Methamphetamine)

D-1 Michael Fraley, Jr.

3. On or about March 24, 2020, in the Eastern District of Michigan, defendant, Michael Fraley, Jr., a/k/a Sarge, knowingly possessed with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

**FORFEITURE ALLEGATION**

4. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

5. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

*s/Grand Jury Foreperson*

GRAND JURY FOREPERSON

SAIMA S. MOHSIN  
Acting United States Attorney

ANTHONY VANCE  
Chief, Branch Offices

*s/Blaine Longsworth*

BLAINE LONGSWORTH  
Assistant United States Attorney

Dated: 6-16-2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 21-cr-20184
--	---------------------------	-----------------------------

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>		<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<b>AUSA's Initials: BL</b>

**Case Title:** USA v. Michael Fraley, Jr., et al

**County where offense occurred:** Genesee

**Offense Type:** Felony

Indictment -- based upon LrCrR 57.10(d) [Complete Superseding section below] U.S. DISTRICT COURT  
FLINT, MICHIGAN

**FILED**  
JUN 16 2021

#### Superseding Case Information

**Superseding to Case No:** 21-cr-20184      **Judge:** Matthew F. Leitman

**Reason:**

Embraces same subject matter but adds the additional defendants or charges below:

<b>Defendant Name</b>	<b>Charges</b>	<b>Prior Complaint (if applicable)</b>
Michael Fraley, Jr.	21 U.S.C. §§ 841(a)(1)	

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**

June 16, 2021

Date

**s/Blaine Longsworth**

Blaine Longsworth  
Assistant United States Attorney  
600 Church Street  
Flint, MI 48502  
blaine.longsworth@usdoj.gov  
(810) 766-5177

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.